

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA**

Z.P., ET. AL,

§

§

Plaintiffs,

§

§

vs.

§

7:24-CV-00151-ACA

§

ERROL GREGORY BRYANT,

§

§

Defendant.

§

DEFENDANT’S MOTION TO EXTEND DEADLINES

COMES NOW, the Defendant, by an through his attorney of record and moves this Honorable Court to extend all deadlines in the agreed upon scheduling order by fourteen days and in support thereof would show the following:

1. That pursuant to the Order of this Court, the parties met and submitted an initial scheduling order.
2. That the parties held a scheduling conference in the chambers of this Honorable Court and agreed to a final version of the scheduling order.

3. That pursuant to this Order, the first of the filings by the Defendant are due today 31 January 2025.
4. That previous co-counsel did not have prior Federal Court experience but agreed to accept representation if co-counsel were available for consultation and to assist at trial if necessary.
5. That instant counsel was retained by the Defendant to be available for consultation by previous counsel and to assist, if necessary, at trial.
6. That since the parties planning meeting, co-counsel for the Defendant has withdrawn from representation.
7. That the Defendant is actively seeking new counsel to replace previous counsel.
8. That the Defendant has a second consultation today, 31 January 2025, and has communicated to instant counsel that he anticipates having new counsel retained by 05 February 2025.
9. That because new counsel will be lead counsel on the case, and charged with the day to day litigation, instant counsel would like to provide new counsel with the opportunity to come on board, consider the issue and have input on the overall plan the defense strategy.
10. That instant counsel respectfully requests an extension of all deadlines by fourteen days to allow the Defendant to retain new counsel.

WHEREFORE, premises considered, the Defendant, by an through his attorney of record and moves this Honorable Court to extend all deadlines in the agreed upon scheduling order by fourteen days.

Respectfully submitted,

/s/ Jason L. Wollitz
Jason L. Wollitz, Esq.
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CERTIFICATE OF SERVICE

COMES NOW, Jason L. Wollitz, Attorney at Law, and does hereby certify that I have served a copy of the foregoing on this the 31st day of January 2025 via electronic transmission, telephone notification or hand delivery.

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Respectfully Submitted,

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